

Statement in Support of Petition for Rule Making.

Proceeding RM-11786

I am president of W & B Broadcasting Co., Inc., licensee of WAKY AM 620, Louisville, Kentucky and W285ER Middletown, Kentucky, which translates the WAKY signal. My comments are applicable for translators that are owned and operated by AM station licensees only.

In my personal experience, translators like W285ER rebroadcasting an AM station signal have given owned and operated AM stations a new opportunity to serve their listeners with full-time FM service. Many of the AM's are daytime only or have night-time coverage that is insufficient to serve their market. I am sure that even though translators have a small coverage area with a maximum 250 watts, these AM broadcasters and the public they serve are extremely pleased to have the benefit of hearing their programming on FM. These low power translators give the AM broadcaster an opportunity to super serve their audience.

Like other AM stations in the US, there are numerous AM's in Kentucky that are now additionally providing their programming to their listeners on FM with their translators. Many of the AM translators are enabling small market broadcasters to offer music and other programming that the full-power stations would never program. Local programming like in-depth local news coverage that includes city council and county magistrate meetings, high school sports and obituaries. Truly, these small market broadcasters are doing a superb of serving the public's needs and interest.

In medium and some large markets, AM's and their translators are providing niche programming to minority and local listeners that is not and will not be offered by the full-power stations.

In addition to all the market challenges, AM stations with translators must also operate under a cloud of jeopardy should an interference complaint be made.

Common sense will tell you that if a translator is creating interference for legitimate listeners of a full-power FM station, those listeners will make the interference problem known to the full-power station long before the end of a one-year period.

Realizing that there are no simple answers, I offer the following recommendation:

If after one year of broadcasting no interference complaints have been submitted, translators should be designated as a signal-protected service as long as they broadcast as licensed. If there have been no complaints after one year of the translator's on-air broadcasting, the cloud of interference jeopardy should be removed for these translators.

I verify that this Statement in Support of Rule Making is true and correct.

Sincerely,

Bill Walters, President
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I certify that on June 16, 2017, a copy of the foregoing statement was deposited in the U.S. Mails postage prepaid addressed to the following:

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/S/ William B. Walters